

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

November 19, 2008

Michael Worley, Treasurer Chico Demos 08 787 Filbert Avenue P.O. Box 4924 Chico, CA 95926 Response Due Date: December 22, 2008

Identification Number: C00455352

Reference:

Amended Statement of Organization, received 10/24/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 3 items:

1. Please clarify your relationship, if any, with the Democratic State Central Committee of California — Federal, which appears to be an affiliated committee. Please be advised that all contributions made by political committees established, financed, maintained, or controlled by the State party committee and by subordinate State party committees shall be presumed to be made by one political committee.

This presumption shall not apply if the political unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit; and the political committee of the party unit in question does not make contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit or political committee established, financed, maintained, or controlled by another party unit. 11 CFR §110.3(b)(3) Further, 11 CFR §100.5(e)(4) defines a party committee as a political committee which represents a political party and is part of the official party structure at the national, State, or local level.

Please clarify your relationship with the Democratic State Central Committee of California – Federal and amend your Statement of Organization, if necessary, to reflect this relationship on Line 6.

- 2. Line 6 of your Statement of Organization discloses the "Chico Democratic Club" with the relationship of "Affiliated Committee." However, the Chico Democratic Club appears to be the nonfederal account of your committee, and therefore should not be disclosed as an "Affiliated Committee." Please amend your Statement of Organization to clarify this apparent discrepancy. For further guidance on affiliated committees, please refer to 11 CFR §100.5(g) and §110.3.
- 3. Line 6 of your Statement of Organization discloses the "Chico Democratic Club" with the relationship of "Connected Organization." Line 5(d), however, indicates that your committee is a subordinate committee of the Democratic Party and not a separate segregated fund.

A separate segregated fund is a political committee established, financed, maintained or controlled by a corporation, labor organization, membership organization, cooperative or trade association.

If your committee is not a separate segregated fund, then you should <u>not</u> have listed any connected organization. Please amend your Statement of Organization to clarify these apparent discrepancies. 2 U.S.C. §433(b) and 11 CFR §102.2

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1172.

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Sincerely,

Alexandra T. Broomhead Campaign Finance Analyst Reports Analysis Division

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